

DESOUZA LAW OFFICES, a professional corporation
JACQUELINE DESOUZA, State Bar No.:133686
PAMELA F. ELLMAN, State Bar No.:164574
2397 Shattuck Avenue, Suite 202
Berkeley, CA 94704
Telephone: (510) 649-3420
Facsimile: (510) 649-1711

Attorneys for Defendant(s):
RWS ENTERPRISES WHICH WILL DO BUSINESS
IN CALIFORNIA AS KIDDIE KANDIDS, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JACQUELYN HARRIS, LORA MOTE, and
COURTNEY COLIANNA, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

RWS ENTERPRISES WHICH WILL DO
BUSINESS IN CALIFORNIA AS KIDDIE
KANDIDS, INC, and DOES 1 through 50,
inclusive,

Defendants.

Case No. C 08-00852 PJH

**STIPULATION OF THE PARTIES AND
[PROPOSED] ORDER RE:
CONTINUANCE OF PLAINTIFFS'
MOTION TO REMAND, AND CASE
MANAGEMENT CONFERENCE DUE
TO SETTLEMENT**

Complaint Filed: January 4, 2008

1 The parties have engaged in settlement discussions and have agreed in principle to the terms of
2 a settlement. They stipulate and agree to continue Plaintiffs' Motion to Remand this Action to State
3 Court and initial Case Management Conference for approximately 30 days in order to reduce their
4 agreement to writing and to file an application for this Court's approval of the settlement. Thus,
5 pursuant to Northern District Local Rules, rule 6.2 and 7.12, the parties, by their attorneys of record,
6 stipulate as follows:

7 (1) Plaintiffs' Motion to Remand presently set for May 21, 2008 be continued to June 25,
8 2008, at 9:00 a.m., and that the deadlines for filing Defendant's opposition and Plaintiffs'
9 reply papers be calculated, in accordance with Federal Rules of Civil Procedure, from the
10 June 18th hearing date; and,

11 (2) The initial Case Management Conference be continued from June 5, 2008, to July 10,
12 2008, at 2:30 p.m. The parties will comply with Federal Rules of Civil Procedure, rule 26
13 subdivision (f).

14 The parties have stipulated and obtained this Court's prior consent to two continuances of
15 Plaintiff's Motion and one continuance of the initial Case Management Conference.

16 IT IS SO STIPULATED:

17 DATED: April 17, 2008

DESOUZA LAW OFFICES
a professional corporation

19 _____
/s/

20 By: Jacqueline deSouza
21 Jacqueline deSouza
22 Attorneys for Defendant
23 RWS ENTERPRISES WHICH WILL DO
24 BUSINESS IN CALIFORNIA AS KIDDIE
25 KANDIDS, INC.
26
27
28

1 DATED: April 21, 2008

LAW OFFICES OF RANDALL CRANE

2 _____
/s/

3 By: Randall Crane

4 Randall Crane

5 Attorneys for Plaintiffs

JACQUELYN HARRIS, LORA MOTE, and

COURTNEY COLIANNA, on behalf of

themselves and all others similarly situated.

6 Pursuant to the Parties' stipulation and Good Cause Appearing, this Court GRANTS the
7 Parties' request for a continuance of Plaintiffs' Motion to Remand. The Plaintiffs' Motion shall be
8 heard on June 25, 2008, at 9:00 am in Department 17 of this Court. Defendant's opposition and
9 Plaintiffs' reply shall be calendared from the June 21, 2008 hearing date in accordance with the
10 Federal Rules of Civil Procedure. The initial Case Management Conference is continued to July 10,
11 2008, at 2:30 p.m., in Department 17.

12 IT IS SO ORDERED:

13
14 DATED: April __, 2008

By: _____

15 The Hon. Phyllis J. Hamilton

16 Judge of the United States District Court

17 Northern District of California